

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE AMERICAN INTERNATIONAL
GROUP, INC. 2007 DERIVATIVE
LITIGATION

) Lead Case No. 07-CV-10464 (LAP)

) (Derivative Action)

This Document Relates To:

ALL ACTIONS.

MOTION TO ADMIT FELIPE J. ARROYO PRO HAC VICE

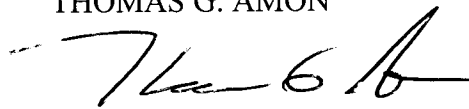
Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern District of New York, I, Thomas G. Amon, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Felipe J. Arroyo
Robbins Umeda & Fink, LLP
610 West Ash Street, Suite 1800
San Diego, CA 92101
Telephone: (619) 525-3990
Facsimile: (619) 525-3991

Felipe J. Arroyo is a member in good standing of the Bar of the State of California (#163803).

DATED: May 27, 2008

LAW OFFICES OF THOMAS G. AMON
THOMAS G. AMON



THOMAS G. AMON (TGA-1515)

250 West 57th Street, Suite 1316
New York, N.Y. 10107
Telephone: (212) 810-2430
Facsimile: (212) 810-2427

ROBBINS UMEDA & FINK, LLP
BRIAN J. ROBBINS
JEFFREY P. FINK
FELIPE J. ARROYO
JULIA M. WILLIAMS
610 West Ash Street, Suite 1800
San Diego, CA 92101
Telephone: (619) 525-3990
Facsimile: (619) 525-3991

Co-Lead Counsel for Plaintiffs

652682 825 5-30-08 JG

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MAY 30 2008

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LITIGATION) (Derivative Action)

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AFFIDAVIT OF THOMAS G. AMON IN SUPPORT OF MOTION TO ADMIT
FELIPE J. ARROYO PRO HAC VICE

State of New York)
) ss:
County of New York)

Thomas G. Amon, being duly sworn, hereby deposes and says as follows:

1. I am an attorney with the Law Offices of Thomas G. Amon, counsel for plaintiffs in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiffs' motion to admit Felipe J. Arroyo as counsel *pro hac vice* to represent plaintiffs in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on May 3, 1974. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Felipe J. Arroyo since 2004.

4. Felipe J. Arroyo is a partner with Robbins Umeda & Fink, LLP, in San Diego, California.

5. I have found Mr. Arroyo to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Felipe J. Arroyo is a member of good standing of the bar of the State of California, as evidenced by the annexed certificate enclosed as Exhibit A.

7. Accordingly, I am pleased to move for the admission of Felipe J. Arroyo, *pro hac vice*.

8. I respectfully submit a proposed order granting the admission of Felipe J. Arroyo, *pro hac vice*, which is attached hereto as Exhibit B.

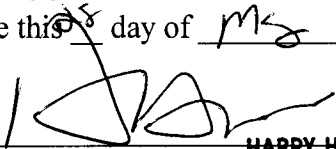
WHEREFORE it is respectfully requested that the motion to admit Felipe J. Arroyo, *pro hac vice*, to represent plaintiffs in the above-captioned matter, be granted.

DATED: May 27, 2008
New York, NY



THOMAS G. AMON

SUBSCRIBED TO AND SWORN TO before
me this 28 day of May 2008.



Notary Public **HARRY H. WISE III**
NOTARY PUBLIC-STATE OF NEW YORK
No. 02WI6106451
Qualified In New York County
My Commission Expires ~~March 01, 2008~~ March 01, 2012



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

May 14, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, FELIPE JAVIER ARROYO #163803 was admitted to the practice of law in this state by the Supreme Court of California on February 3, 1993; that from the date of admission to July 8, 1994, he was an ACTIVE member of the State Bar of California; that on July 8, 1994, he transferred at his request to the INACTIVE status as of January 1, 1994; that from that date to January 27, 1995, he was an INACTIVE member of the State Bar of California; that on January 27, 1995, he transferred at his request to the ACTIVE status; that he has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert", is written over the printed name.

Kath Lambert

Custodian of Membership Records

UNITED STATES DISTRICT COURT
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**[PROPOSED] ORDER FOR ADMISSION *PRO HAC VICE* OF
FELIPE J. ARROYO ON WRITTEN MOTION**

Upon the motion of Thomas G. Amon, attorney for plaintiffs and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Felipe J. Arroyo
Robbins Umeda & Fink, LLP
610 West Ash Street, Suite 1800
San Diego, CA 92101
Telephone: (619) 525-3990
Facsimile: (619) 525-3991
Email address: farroyo@ruflaw.com

is admitted to practice *pro hac vice* as counsel for plaintiffs in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including Rules governing discipline of attorneys.

As this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

DATED: May ___, 2008
New York, NY

HONORABLE LORETTA A. PRESKA
United States District Court Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AFFIDAVIT OF SERVICE

LINETIA SHARPE, being duly sworn deposes and says:

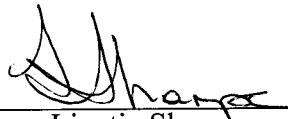
I am over 18 years of age and am not a party to above-captioned action.

On Wednesday, May 28, 2008, I served a copy of the accompanying Notice of Motion upon the defendants by mailing a copy of it to their counsel of record in the action in a first class postpaid envelope that I deposited in an official depository under the exclusive care and custody of the United States Postal Service within the State, addressed to their counsel as follows:

Joseph S. Allerhand
Robert F. Carangelo
Weil, Gotshal & Manges, LLP
767 Fifth Avenue
New York, NY 10153

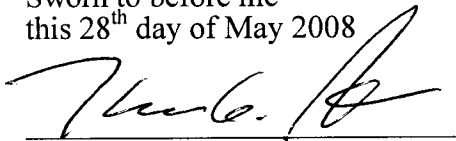
that being the address designated by them for that purpose, and at which they maintained an office.

Dated: New York, New York
May 28, 2008



Linetia Sharpe

Sworn to before me
this 28th day of May 2008



NOTARY PUBLIC

Thomas G. Amon
Notary Public, State of New York
No. 02AM6059182
Qualified in New York County
Commission Expires May 21, 2011